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12 *UAW and UAW Local 422*

13 **IN THE UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15

16 FCA US LLC,

17 Plaintiff,

18 v.

19 INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND
20 AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA (UAW)
21 and UAW LOCAL 422,

22 Defendants.
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Case No.: 2:25-cv-00733-SB-E

**DEFENDANTS' NOTICE OF
RELATED CASE**

1 **PLEASE TAKE NOTICE** that pursuant to Local Rule 83-1.3, Defendants
2 International Union, United Automobile, Aerospace and Agricultural Implement Workers
3 (UAW) and UAW Local 422 submit that the following actions pending in this Court are
4 related because they arise from the same or closely related events, call for determination
5 of the same or similar questions of law and fact, and would entail substantial duplication
6 of labor if heard by different judges:

- 7 • *FCA US LLC v. International Union, United Automobile, Aerospace and*
8 *Agricultural Implement Workers (UAW) and UAW Local 230*, C.D. Cal. Case No.
9 5:24-cv-02123-KK-DTB, filed October 3, 2024 (“*UAW Local 230*”).
- 10 • *FCA US LLC v. International Union, United Automobile, Aerospace and*
11 *Agricultural Implement Workers (UAW) and UAW Local 422*, C.D. Cal. Case No.
12 2:25-cv-00733-SB-E, filed October 4, 2024 and transferred to the Central District
13 of California on January 31, 2025 (“*UAW Local 422*”).

14 *UAW Local 422* was transferred to the Central District of California because the
15 case involves the same facts, the same legal dispute, and mostly the same parties (except
16 for the particular UAW local union named as an additional defendant) as twelve actions
17 filed by Plaintiff FCA US LLC (“Stellantis”) in district courts around the United States
18 including *UAW Local 230*. The parties all agreed that the cases should be consolidated
19 but disagreed about which court they should be consolidated in, and the District of
20 Massachusetts deemed it appropriate to transfer the case to this Court.

21 Stellantis’ twelve actions challenge the same actions by the UAW and its affiliated
22 local unions. The complaint in *UAW Local 422* is virtually identical to the complaint in
23 the *UAW Local 230* action (and to the complaints in the other Stellantis actions in other
24 courts), except that the *UAW Local 230* action names a southern California local union as
25 a defendant while *UAW Local 422* names a Massachusetts-based local union as a
26 defendant. Compare *UAW Local 422*, Dkt. 1 with *UAW Local 230*, Dkt. 1. *UAW Local*
27 *230* was the first-filed of Stellantis’ twelve cases, and is pending before the Hon. Kenly
28 Kiya Kato. The union defendants’ motion for judgment on the pleadings in that action is

1 fully briefed, and Judge Kato has already taken the matter under submission without oral
2 argument, suggesting that she has already invested considerable time and resources in the
3 case. *See UAW Local 230*, Dkt. 53 (Jan. 31, 2025).

4 Stellantis' complaints in *UAW Local 422* and *UAW Local 230* (as well as
5 Stellantis' other cases) uniformly allege that the union defendants breached the same
6 collective bargaining agreement between the UAW and Stellantis that applies to the
7 UAW and both local unions in question, and breached the implied covenant of good faith
8 and fair dealing, by filing grievances challenging Stellantis' conduct with respect to
9 certain investments Stellantis agreed to make, communicating to the public and their
10 members in connection with those grievances, and threatening to strike in support of
11 those grievances. The union defendants have asserted identical defenses in both cases.
12 *See UAW Local 422*, Dkt. 11; *UAW Local 230*, Dkt. 31.

13 The union defendants in Stellantis' cases filed motions to transfer to the Central
14 District of California pursuant to the first-to-file rule, or in the alternative to dismiss or
15 stay the later-filed actions. *See UAW Local 422*, Dkt. 15. Without expressly relying on
16 the first-to-file rule, the District of Massachusetts granted the union defendants' motion
17 to transfer *UAW Local 422* to the Central District of California because "all parties agree
18 that these proceedings should be before a single district court," and the Massachusetts-
19 based local union defendant in *UAW Local 422* waived venue in the Central District of
20 California. *UAW Local 422*, Dkt. 30 at 2.

21 Given the overwhelming overlap between these actions, and the Massachusetts
22 court's intent in transferring *UAW Local 422* that it should be resolved by the same judge
23 as in *UAW Local 230*, Defendants respectfully submit that *UAW Local 422* should be
24 deemed a related case to *UAW Local 230* and transferred to Judge Kato. Deeming these
25 cases related will conserve judicial and party resources and avoid the risk of conflicting
26 rulings. Following transfer, Defendants will request that the cases be coordinated.

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2 Dated: February 3, 2025

Respectfully submitted,

3 By: /s/ Eileen B. Goldsmith
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23 *UAW and UAW Local 230 in Case No. 5:24-*
24 *cv-02123-KK-DTB and*
25 *UAW and UAW Local 422 in Case No. 2:25-*
26 *cv-00733-SB-E*